

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
HUNTINGTON DIVISION**

**CHARLES JOHNSON, et al.,  
Plaintiffs,  
v.**

**CIVIL ACTION NO.:  
3:13-cv-6529 (consolidated)**

**Judge Robert C. Chambers**

**FORD MOTOR COMPANY,  
Defendant.**

**AFFIDAVIT OF JOHN TANGREN REGARDING THE ATTORNEYS' FEES, EXPERT  
FEES, AND COSTS RESULTING FROM FORD'S DISCOVERY MISCONDUCT**

I, John Tangren, being first duly sworn, being competent to testify in the above-captioned action, and having personal knowledge of the facts stated herein, depose and state as follows:

1. I am a partner of the law firm DiCello Levitt & Casey LLC. I have been a member of the bar of the State of Illinois since 2003. I am also admitted to practice in the Supreme Court of the United States; the Courts of Appeals for the Seventh, Eighth, and Ninth Circuits; and the United States District Courts for the District of Colorado, the Northern District of Illinois, and the Eastern District of Michigan.

2. I am one of the attorneys representing Plaintiffs in the above-captioned litigation and have been admitted *pro hac vice* in this action. (*See* ECF No. 17.)

3. I make this Affidavit based upon my personal knowledge and experience and in support of Plaintiffs' request for an award of attorneys' fees, expert fees, and costs as provided by this Court's December 29, 2017 Order (ECF No. 1120). Plaintiffs' request is based on the Court's finding in its December 27, 2017 Memorandum Opinion and Order that Plaintiffs are entitled to an award of their fees and costs attributable to misrepresentations that Defendant Ford Motor Company made to this Court regarding the security it provided its source code. (*See* ECF No. 1111 at 1-12, 19-20.)

4. The work and expenses for which Plaintiffs' attorneys and experts seek reimbursement of their fees and costs is detailed in Exhibits A-O attached hereto. These Exhibits have been compiled from the contemporaneously kept time and expense records of each of the attorneys and experts who worked on the pertinent issues. By attaching Exhibits A-O, Plaintiffs are in no way waiving the attorney-client privilege or work product doctrine.

5. In their motion for relief relating to Ford's discovery misconduct, Plaintiffs sought sanctions against Ford relating to two issues: "(1) first, whether Ford made material misrepresentations to the Court that impacted this litigation to the detriment of Plaintiffs; [and] (2) second, whether Ford failed to produce source code in violation of the Court's orders." (ECF No. 1111 at 5.) The Court has found that sanctions are appropriate as to the first of these issues, but not the second. (*See* ECF No. 1111 at 19-20.) Thus, the time and expense entries in the attached Exhibits that relate to the briefing of Plaintiffs' motion for relief relating to Ford's discovery misconduct have been reduced in half to reflect that Plaintiffs are seeking reimbursement of their fees for the first issue only, pursuant to this Court's ruling.

6. Exhibit A to this Affidavit is an accounting of work performed relating to the pertinent issues by members of the Barr Group, an expert firm with expertise in embedded software and source code analysis. The time between May 23, 2015 and May 28, 2015 reflects the work done by Nigel Jones in preparing for and testifying at the May 28, 2015 hearing relating to the source code protective order. The entries between May 23, 2015 and October 14, 2016 reflects the time expended by Michael Barr, Jacob Beningo, Tom Brooks, Steve Loudon, Mr. Jones, Dan Smith, and Michael Wilk traveling to and from Dearborn, Michigan to perform review and analysis of Ford's source code in the secure source code room. The reported hourly rates are the rates that the involved experts currently charge to hourly clients for expert services.

7. Exhibit B to this Affidavit is an accounting of costs expended by the Barr Group in the course of their work relating to the pertinent issues. The expense dated June 9, 2015 relates to Mr. Jones's travel to and from West Virginia for the May 28, 2015 source code protective order hearing. The remaining expenses relate to travel by Barr Group experts to and from Dearborn, Michigan to perform review and analysis of Ford's source code in the secure source code room.

8. Exhibit C to this Affidavit is an accounting of work performed relating to the pertinent issues by Anthony DeWitt, a partner with the law firm of Bartimus Frickleton Robertson & Rader. Exhibit C reflects the work done by Mr. DeWitt on Plaintiffs' response to Ford's motion for an extension of time to respond to Plaintiffs' motion for relief relating to Ford's discovery misconduct. This time has been reduced by half for the reasons discussed above. The reported hourly rate is the rate that Mr. DeWitt currently charges to hourly clients for legal services.

9. Exhibit D to this Affidavit is an accounting of work performed relating to the pertinent issues by Adam Levitt, John Tangren, and Amy Keller, partners, and Audree Lebdcjiri, paralegal, with the law firm of DiCello Levitt & Casey LLC. Exhibit F reflects the work done by DiCello Levitt & Casey LLC on the briefing of Plaintiffs' motion for relief relating to Ford's discovery misconduct and related matters. This time has been reduced by half for the reasons discussed above. The reported hourly rates are the rates that the involved attorneys and legal professional currently charge to hourly clients for legal services.

10. Exhibit E to this Affidavit is an accounting of work performed relating to the pertinent issues by members of Edge Case Research, an expert firm with expertise in embedded software and vehicle safety. Exhibit D reflects the work done by Edge Case researchers Aaron

Kane, Ryan McNulty, Jacob Nelson, Justin Ray, and Zach Rousselle to review and analyze the source code files attached to the emails produced by Ford that were at issue in Plaintiffs' motion for relief related to Ford's discovery misconduct. Although this work supported Plaintiffs' briefing of that motion, because the work performed by Edge Case Research pertained solely to establishing that the nature of the emails was inconsistent with what Ford had represented about the security it provides its source code, no adjustment of this time was necessary. The reported hourly rates are the rates that the involved experts currently charge to hourly clients for expert services.

11. Exhibit F to this Affidavit is an accounting of costs expended by Edge Case Research in the course of their work relating to the pertinent issues. Exhibit E reflects the costs of the software licenses that were needed for Edge Case Research to perform the source code review and analysis described in the previous paragraph.

12. Exhibit G to this Affidavit is an accounting of work performed relating to the pertinent issues by Adam Levitt and John Tangren, who were at that time partner and senior counsel respectively with the law firm of Grant & Eisenhofer P.A. Exhibit G reflects the work done by Grant & Eisenhofer P.A. on the preparation, negotiation, and arguments relating to the source code protective order. The reported hourly rates are the rates that the involved attorneys currently charge to hourly clients of their current law firm of DiCello Levitt & Casey LLC for legal services.

13. Exhibit H to this Affidavit is an accounting of costs expended by Grant & Eisenhofer P.A. in the course of their work relating to the pertinent issues. Exhibit H reflects the cost of travel for Mr. Levitt and Mr. Tangren to attend a meeting with experts and co-counsel on

May 15, 2015 and a hearing before this Court on May 28, 2015, both relating to the source code protective order.

14. Exhibit I to this Affidavit is an accounting of work performed relating to the pertinent issues by Greg Travalio and Shawn Judge, of counsel, and Mark Troutman, partner, with the law firm of Isaac Wiles Burkholder & Teetor, LLC. Exhibit I reflects the work done by Isaac Wiles Burkholder & Teetor, LLC on the briefing of Plaintiffs' motion for relief relating to Ford's discovery misconduct and related matters. This time has been reduced by half for the reasons discussed above. The reported hourly rates are the rates that the involved attorneys currently charge to hourly clients for legal services.

15. Exhibit J to this Affidavit is an accounting of work performed relating to the pertinent issues by Philip Koopman, Ph.D., Associate Professor at Carnegie Mellon University, Department of Electrical and Computer Engineering, whose work includes an emphasis on embedded software systems, particularly the safety of such systems. Exhibit J reflects three different categories of work done by Dr. Koopman: (1) the time Dr. Koopman expended traveling to and from Dearborn, Michigan to perform review and analysis of Ford's source code in the secure source code room, (2) the preparation of the expert reports that Dr. Koopman has submitted in this case, which informed Plaintiffs' motion for relief relating to Ford's discovery misconduct, and (3) direct support that Dr. Koopman provided to the briefing of Plaintiffs' motion for relief relating to Ford's discovery misconduct, including but not limited to the preparation of two declarations in support. The time in the second category has been reduced by 90 percent, based on Dr. Koopman's estimate that 10 percent of the time he spent preparing the expert reports pertained to establishing that the nature of the Ford emails at issue was inconsistent with what Ford had represented about the security it provides its source code. The

time in the third category has been reduced by half for the reasons discussed above. The reported hourly rate is the rate that Dr. Koopman currently charges to hourly clients for expert services.

16. Exhibit K to this Affidavit is an accounting of costs expended by Dr. Koopman in the course of his work relating to the pertinent issues. These expenses relate to Dr. Koopman's travel to and from Dearborn, Michigan to perform review and analysis of Ford's source code in the secure source code room.

17. Exhibit L to this Affidavit is an accounting of work performed relating to the pertinent issues by Donald Slavik, principal, and Kathy Kuryak, paralegal, with the law firm of Slavik Law. The time between August 3, 2015 and September 22, 2015 reflects the work done by Mr. Slavik on the preparation, negotiation, and arguments relating to the source code protective order. The time between October 6, 2015 and March 2, 2017, as well as the time entries of May 9, 2017 and June 14, 2017 reflects the work done by Mr. Slavik in supporting and coordinating the review of source code in the secure source code room in Dearborn, Michigan. The remaining time between May and September 2017 reflects the work done by Mr. Slavik and Ms. Kuryak in establishing that the nature of the Ford emails at issue in Plaintiffs' motion for relief relating to Ford's discovery misconduct was inconsistent with what Ford had represented about the security it provides its source code. The reported hourly rates are the rates that Mr. Slavik and Ms. Kuryak currently charge to hourly clients for legal services.

18. Exhibit M is an accounting of costs expended by Slavik Law in the course of their work relating to the pertinent issues. These expenses relate to Mr. Slavik's travel to and from Dearborn, Michigan to support the review and analysis of Ford's source code in the secure

source code room, as well as other expenses necessitated by such review and analysis being limited to the secure source code room.

19. Exhibit N is an accounting of work performed relating to the pertinent issues by Niall Paul, Nathan Atkinson, and Kelly Griffith, members, Meg Copley, attorney, Andrew Darcy and M. Rebecca Hendrix, associates, Sandra Burch, project manager, and Pamela Haynes, paralegal, with the law firm of Spilman Thomas & Battle, PLLC. The time between April 3, 2015 and September 23, 2015 reflects the work done by Spilman Thomas & Battle, PLLC on the preparation, negotiation, and arguments relating to the source code protective order. The remaining time reflects the work done by Spilman Thomas & Battle, PLLC on the briefing of Plaintiffs' motion for relief relating to Ford's discovery misconduct and related matters; this time has been reduced by half for the reasons discussed above. The reported hourly rates are based on Plaintiffs' best estimate of reasonable hourly rates for West Virginia counsel practicing complex litigation as evidenced in *Good v. West Virginia-American Water Co.*, No. 14-1374, 2017 WL 2884535, at \*27 (S.D. W. Va. July 6, 2017) (noting with approval hourly rates for attorneys as high as \$575 per hour).

20. Exhibit O is an accounting of costs expended by Spilman Thomas & Battle, PLLC in the course of their work relating to the pertinent issues. The expenses in 2015 were incurred in the course of the preparation, negotiation, and arguments relating to the source code protective order. The remaining expenses were incurred in connection with the briefing of Plaintiffs' motion for relief relating to Ford's discovery misconduct and related matters; these expenses have been reduced by half for the reasons discussed above.

21. The time and cost entries included in Exhibits A-O include, to the best of my knowledge and recollection, only those entries that could be confirmed to relate directly to the

source code protective order, to reviewing source code in the secure room in Dearborn, Michigan rather than in a more convenient location, and to the briefing of Plaintiffs' motion for relief relating to Ford's discovery misconduct. I have personally reviewed hundreds of additional time entries reflecting hundreds of hours of time spent on source-code-related matters that may possibly have also related to these specific issues, but for which neither the descriptions nor the context were sufficiently specific to conclusively determine that they could be linked to any of the issues implicated by the Court's December 27, 2017 ruling. Out of an abundance of caution, none of those entries have been included in this Affidavit.

22. Thus, it is likely that the time and costs reported in this Affidavit significantly understate the actual time and costs that Plaintiffs have expended as a result of the misrepresentations by Ford discussed in the Court's December 27, 2017 Order.

Further Affiant saith not.

This the 19<sup>th</sup> day of January, 2018.

John Tangren  
John Tangren

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to-wit:

Taken, subscribed and sworn to before the undersigned Notary Public on this 19<sup>th</sup> day of January, 2018.

My commission expires: May 10, 2022  
Shawna D. Walker  
Notary Public





# Exhibit A

**BARR GROUP TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
5/23/2015	Nigel Jones	\$525.00	2.50	\$1,312.50	Read Ford Court Filing, Spoke with Niall, Spoke with S.Loudon, Wrote Response to Ford
5/25/2015	Nigel Jones	\$525.00	4.75	\$2,493.75	Meeting with S.Singer to Review Court Presentation, Reviewed Brief from Niall
5/26/2015	Nigel Jones	\$525.00	0.50	\$262.50	Prep for Travel
5/27/2015	Nigel Jones	\$525.00	12.75	\$6,693.75	Travel, Prep for Hearing
5/28/2015	Nigel Jones	\$525.00	12.75	\$6,693.75	Testifying at Hearing, Return Travel
10/6/2015	Nigel Jones	\$525.00	4.50	\$2,362.50	Travel to Detroit
10/8/2015	Nigel Jones	\$525.00	4.50	\$2,362.50	Travel home
11/11/2015	Tom Brooks	\$325.00	10.00	\$3,250.00	Travel
11/27/2015	Michael Wilk	\$325.00	1.00	\$325.00	Travel arrangements
11/30/2015	Dan Smith	\$395.00	7.75	\$3,061.25	Travel to Source Code Room
11/30/2015	Steve Loudon	\$550.00	8.00	\$4,400.00	Travel to Source Code Room
12/1/2015	Tom Brooks	\$325.00	4.00	\$1,300.00	Travel
12/3/2015	Dan Smith	\$395.00	9.00	\$3,555.00	Travel - Dearborn to Los Angeles
12/3/2015	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
12/4/2015	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
12/4/2015	Tom Brooks	\$325.00	6.00	\$1,950.00	Return Travel
12/7/2015	Michael Wilk	\$325.00	9.00	\$2,925.00	Travel to Dearborn
12/10/2015	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
12/10/2015	Michael Wilk	\$325.00	9.00	\$2,925.00	Travel from Dearborn
12/11/2015	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
12/11/2015	Michael Barr	\$575.00	3.00	\$1,725.00	Return travel
12/11/2015	Steve Loudon	\$550.00	8.00	\$4,400.00	Travel Time
12/14/2015	Dan Smith	\$395.00	8.50	\$3,357.50	Travel - Los Angeles to Dearborn
12/14/2015	Tom Brooks	\$325.00	4.00	\$1,300.00	Travel

**BARR GROUP TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
12/16/2015	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
12/16/2015	Tom Brooks	\$325.00	4.00	\$1,300.00	Return Travel
12/17/2015	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
12/18/2015	Dan Smith	\$395.00	9.00	\$3,555.00	Travel - Dearborn to Los Angeles
12/18/2015	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/3/2016	Michael Wilk	\$325.00	9.00	\$2,925.00	Travel to Dearborn
1/3/2016	Steve Loudon	\$550.00	8.00	\$4,400.00	Travel to/from Dearborn
1/8/2016	Michael Wilk	\$325.00	9.00	\$2,925.00	Travel from Dearborn
1/9/2016	Steve Loudon	\$550.00	8.00	\$4,400.00	Travel to/from Dearborn
1/10/2016	Dan Smith	\$395.00	9.25	\$3,653.75	Travel Los Angeles - Dearborn
1/11/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/13/2016	Dan Smith	\$395.00	1.00	\$395.00	Commute
1/13/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/14/2016	Dan Smith	\$395.00	1.00	\$395.00	Commute
1/14/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/15/2016	Dan Smith	\$395.00	9.00	\$3,555.00	Commute, travel Dearborn - Los Angeles
1/15/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/17/2016	Dan Smith	\$395.00	9.00	\$3,555.00	Travel - Los Angeles to Dearborn
1/17/2016	Michael Wilk	\$325.00	9.00	\$2,925.00	Travel to Dearborn
1/21/2016	Michael Wilk	\$325.00	9.00	\$2,925.00	Travel from Dearborn
1/22/2016	Dan Smith	\$395.00	9.00	\$3,555.00	Travel
1/24/2016	Steve Loudon	\$550.00	8.00	\$4,400.00	Travel to/from Dearborn
1/25/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/26/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/28/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
1/29/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn

**BARR GROUP TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
1/29/2016	Steve Loudon	\$550.00	8.00	\$4,400.00	Travel to/from Dearborn
2/7/2016	Steve Loudon	\$550.00	7.00	\$3,850.00	Travel to DTW
2/10/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
2/11/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
2/12/2016	Jacob Beningo	\$325.00	2.75	\$893.75	Travel to and from Dearborn
2/13/2016	Steve Loudon	\$550.00	7.00	\$3,850.00	Travel from DTW
5/16/2016	Steve Loudon	\$550.00	8.00	\$4,400.00	Travel to DTW
5/18/2016	Steve Loudon	\$550.00	6.00	\$3,300.00	Travel from DTW
10/11/2016	Dan Smith	\$395.00	3.00	\$1,185.00	Travel
10/12/2016	Dan Smith	\$395.00	6.75	\$2,666.25	Travel
10/13/2016	Dan Smith	\$395.00	1.00	\$395.00	Commute
10/14/2016	Dan Smith	\$395.00	10.25	\$4,048.75	Commute
<b>Totals</b>			<b>347.25</b>	<b>\$145,701.25</b>	

# Exhibit B

**BARR GROUP EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Description</b>
06/09/2015	\$588.78	Jones Trip to WV (05/27 - 05/28) Mileage, Hotel
11/04/2015	\$881.93	Loudon trip to Detroit (10/06 - 10/15) Airfare, Rental Car
11/04/2015	\$1,137.32	Jones Trip to Detroit (10/06 - 10/08) Airfare, Mileage, Parking, Taxis, Hotel
11/04/2015	\$150.00	Jones Trip to Detroit (10/06 - 10/08) Per Diem
11/04/2015	\$420.00	Loudon trip to Detroit (10/06 - 10/15) Per diem
12/09/2015	\$810.00	Loudon trip to Detroit (11/08 - 11/21) Per diem
12/09/2015	\$120.00	Brooks trip to Detroit (11/11 - 11/13) Per diem
12/09/2015	\$1,643.39	Brooks trip to Detroit (11/11 - 11/13) Airfare, Rental Car/ Fuel, Hotel, Mileage, Parking
12/09/2015	\$4,974.20	Loudon trip to Detroit (11/08 - 11/21) Airfare, Hotel, Rental Car
01/07/2016	\$1,489.22	Wilk travel to Detroit (12/07 - 12/10) Hotel, parking, mileage, Airfare, Rental car
01/07/2016	\$240.00	Smith travel to Detroit (12/15 - 12/18) Per diem
01/07/2016	\$1,860.52	Smith travel to Detroit (12/15 - 12/18) Airfare, Hotel, Taxis, Rental Car
01/07/2016	\$180.00	Smith travel to Detroit (11/30 - 12/03) Per diem
01/07/2016	\$1,349.86	Smith travel to Detroit (11/30 - 12/03) Airfare, hotel, transit
01/07/2016	\$640.00	Loudon travel to Detroit (12/01 - 12/11) Per diem
01/07/2016	\$2,935.52	Loudon travel to Detroit (12/01 - 12/11) Hotel, Taxis, Rental car fuel
01/07/2016	\$180.00	Brooks travel to Detroit (12/14 - 12/16) Per diem
01/07/2016	\$1,753.02	Brooks travel to Detroit (12/14 - 12/16) Airfare, Rental car, Fuel, Mileage, Parking, Hotel
01/07/2016	\$240.00	Brooks travel to Detroit (12/01 - 12/04) Per diem
01/07/2016	\$2,167.20	Brooks travel to Detroit (12/01 - 12/04) Airfare, Rental car, Mileage, Parking, Hotel
01/07/2016	\$240.00	Wilk travel to Detroit (12/07 - 12/10) Per diem
01/07/2016	\$105.00	Barr travel to Detroit (12/10 - 12/11) Per diem
01/07/2016	\$918.20	Barr travel to Detroit (12/10 - 12/11) Airfare, Taxis, Parking, Lodging
01/07/2016	\$563.36	Beningo Mileage December

**BARR GROUP EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Description</b>
02/08/2016	\$643.84	Beningo Mileage January
02/08/2016	\$1,457.03	Loudon trip to Detroit (1/03 - 1/10) Transport
02/08/2016	\$1,577.25	Loudon trip to Detroit (1/24 - 1/29) Transportation
02/08/2016	\$1,261.65	Smith Trip to Detroit (1/11 - 1/15) Transportation
02/08/2016	\$1,199.22	Smith Trip to Detroit (1/17 - 1/22) Transportation
02/08/2016	\$1,578.13	Wilk trip to Detroit (1/03- 1/08) Transportation
02/08/2016	\$1,367.91	Wilk trip to Detroit (1/17 - 1/21) Transportation
02/08/2016	\$683.27	Barr trip to Detroit ( 01/12 - 01/13) Transportation
02/08/2016	\$1,178.91	Loudon trip to Detroit (1/03 - 1/10) Hotel
02/08/2016	\$1,093.45	Loudon trip to Detroit (1/24 - 1/29) Hotel
02/08/2016	\$1,478.92	Smith Trip to Detroit (1/11 - 1/15) Hotel
02/08/2016	\$610.81	Smith Trip to Detroit (1/17 - 1/22) Hotel
02/08/2016	\$1,077.30	Wilk trip to Detroit (1/03- 1/08) Hotel
02/08/2016	\$1,021.92	Wilk trip to Detroit (1/17 - 1/21) Lodging
02/08/2016	\$198.18	Barr trip to Detroit ( 01/12 - 01/13) Lodging
02/08/2016	\$450.00	Loudon trip to Detroit (1/03 - 1/10) Meals
02/08/2016	\$375.00	Loudon trip to Detroit (1/24 - 1/29) Meals
02/08/2016	\$325.00	Smith Trip to Detroit (1/11 - 1/15) Meals
02/08/2016	\$325.00	Smith Trip to Detroit (1/17 - 1/22) Meals
02/08/2016	\$390.00	Wilk trip to Detroit (1/03- 1/08) Per diem
02/08/2016	\$325.00	Wilk trip to Detroit (1/17 - 1/21) Meals
02/08/2016	\$81.25	Barr trip to Detroit ( 01/12 - 01/13) Meals
03/06/2016	\$357.50	Loudon Trip to Detroit (2/7 - 2/14) Meals
03/06/2016	\$1,245.54	Loudon Trip to Detroit (2/7 - 2/14) Hotel
03/06/2016	\$234.90	Beningo Travel to Code Room (2/10 - 2/12)
03/06/2016	\$1,544.31	Loudon Trip to Detroit (2/7 - 2/14) Transportation
06/02/2016	\$1,181.93	Loudon Trip to Detroit (05/16 - 05/18) airfare, rental car, rental car fuel

**BARR GROUP EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Description</b>
06/02/2016	\$165.00	Loudon Trip to Detroit (05/16 - 05/18) meals per diem
06/02/2016	\$439.80	Loudon Trip to Detroit (05/16 - 05/18) lodging
11/11/2016	\$33.50	Meals, Loudon: Per Diem
11/11/2016	\$1,084.96	Transportation, Loudon: Airfare SAN/PHX - 10/16 & 10/23
11/11/2016	\$63.00	Transportation, Smith: Rides
11/11/2016	\$247.20	Transportation, Smith: Rental Car/Gas
11/11/2016	\$304.06	Lodging, Smith: Hotel 10/12 - 10/14
11/11/2016	\$1,291.20	Transportation, Smith: Airfare LAX/Detroit - 10/11 & 10/14
11/11/2016	\$195.00	Meals, Smith: Per Diem
11/11/2016	\$390.00	Meals, Loudon: Per Diem
02/07/2017	\$325.00	S. Loudon: Meals - Per Diem
02/07/2017	\$1,101.08	S.Loudon: Transportation - Flight 1/29 & 2/5 SAN/DTW/SAN
03/07/2017	\$1,101.08	Loudon: Transportation - 2/26 & 3/11 - SAN/DTW
03/07/2017	\$780.00	Loudon: Meals - Per Diem
03/07/2017	\$1,101.08	Loudon: Transportation - 2/11 & 2/18 - SAN/DTW
04/06/2017	\$65.00	Loudon Meals - Per Diem
<b>Total Expenses</b>	<b>\$57,537.70</b>	



# Exhibit C

**BARTIMUS FRICKLETON ROBERTSON & RADER TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/22/2017	Anthony DeWitt	\$550.00	13.20	6.60	\$3,630.00	Phone call to co-counsel re Ford's motion for extension; review and analyze same; conduct legal research re same
<b>Totals</b>				<b>6.60</b>	<b>\$3,630.00</b>	

# Exhibit D

**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/7/2017	Amy Keller	\$675.00	3.60	1.80	\$1,215.00	Begin draft of motion for sanctions; Research into case law regarding same; Discuss with co-counsel
6/7/2017	John Tangren	\$725.00	1.10	0.55	\$398.75	Discuss and draft correspondence to co-counsel re discovery sanctions motion
6/9/2017	Amy Keller	\$675.00	3.80	1.90	\$1,282.50	Continued work on draft of motion for sanctions as it relates to Ford's discovery misconduct; Conference calls with co-counsel re same
6/9/2017	John Tangren	\$725.00	1.80	0.90	\$652.50	Review recent opinions re discovery sanctions; exchange correspondence with co-counsel re discovery sanctions motion; prepare for and conduct teleconference with co-counsel re discovery sanctions motion
6/10/2017	Amy Keller	\$675.00	2.40	1.20	\$810.00	Review/analyze documents from co-counsel to which source code was attached from Ford; Discuss same with Nathan Atkinson; Continued work on sanctions motion
6/12/2017	Amy Keller	\$675.00	3.60	1.80	\$1,215.00	Review fact section authored by co-counsel in sanctions motion and make revisions to same; Research related to facts concerning source code issues; Research similar conduct by other manufacturers
6/12/2017	John Tangren	\$725.00	0.30	0.15	\$108.75	Discuss motion for discovery sanctions
6/13/2017	Amy Keller	\$675.00	4.40	2.20	\$1,485.00	Continued work on sanctions motion; Research related to discovery violations; Send e-mail update re same; Circulate draft brief
6/14/2017	Adam Levitt	\$950.00	1.00	0.50	\$475.00	Correspondence with co-counsel re status of sanctions motion papers; engaged in follow up re same

**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/14/2017	Amy Keller	\$675.00	6.00	3.00	\$2,025.00	Exchange drafts of sanctions motion with co-counsel and discuss revisions to same; Review cases related to discovery misconduct in district court and incorporate similar language; Continued drafting; Draft/revise motion to seal documents (research related to same and discussion with co-counsel); Revise motion for discovery sanctions based upon transcripts produced by co-counsel; Review transcripts and prepare quotes from exhibits for brief and highlight same for court
6/14/2017	John Tangren	\$725.00	2.00	1.00	\$725.00	Discuss motion for discovery sanctions; review and comment on draft motion for sanctions
6/15/2017	Adam Levitt	\$950.00	1.50	0.75	\$712.50	Reviewed and revised sanctions motion paper, discussed same
6/15/2017	Amy Keller	\$675.00	2.20	1.10	\$742.50	Continued work on sanctions motion and discuss Koopman declaration with co-counsel; researching and revisions to sanctions motion
6/15/2017	John Tangren	\$725.00	0.20	0.10	\$72.50	Discuss motion for discovery sanctions
6/16/2017	Adam Levitt	\$950.00	2.30	1.15	\$1,092.50	Reviewed sanction motion papers; discussed and corresponded with co-counsel re same; engaged in follow up relating thereto
6/16/2017	Amy Keller	\$675.00	13.00	6.50	\$4,387.50	Work on draft of motion for sanctions, motion to seal, exhibits, and memoranda in support; incorporate edits; further research and revisions; discuss same with AJL and JET; finalize and file same

**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/16/2017	John Tangren	\$725.00	3.70	1.85	\$1,341.25	Discuss and exchange correspondence with co-counsel re motion for sanctions; review and comment on motion for sanctions and supporting expert affidavit; conduct teleconference with co-counsel re motion for sanctions; draft and discuss motion for sanctions and motion for leave to file under seal
6/17/2017	John Tangren	\$725.00	0.10	0.05	\$36.25	Exchange correspondence with co-counsel re recent filing
6/19/2017	Amy Keller	\$675.00	0.40	0.20	\$135.00	Discuss courtesy copies with co-counsel concerning sanctions motion; Provide copies of same to co-counsel
6/19/2017	John Tangren	\$725.00	0.60	0.30	\$217.50	Discuss and exchange correspondence with co-counsel re sanctions motion
6/20/2017	Adam Levitt	\$950.00	0.30	0.15	\$142.50	Followed up on sanctions motion; teleconference with co-counsel re same
6/22/2017	Adam Levitt	\$950.00	1.00	0.50	\$475.00	Continued reviewing extension motion; corr with co-counsel re same; conducted research relating thereto; discussed same
6/22/2017	John Tangren	\$725.00	1.10	0.55	\$398.75	Review and discuss defendant's motion for extension of time; conduct teleconference and exchange correspondence with co-counsel re response to defendant's motion for extension of time
6/23/2017	John Tangren	\$725.00	1.40	0.70	\$507.50	Conduct teleconference and exchange correspondence with co-counsel re response to motion for extension; discuss motion for extension response and sanctions motion

**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/24/2017	Amy Keller	\$675.00	5.60	2.80	\$1,890.00	Research Fourth Circuit case law concerning extensions and sanction issues for response in opposition to motion for extension of time; Draft/revise draft response to motion for extension of time; Provide edits
6/25/2017	Amy Keller	\$675.00	2.20	1.10	\$742.50	Revisions to draft opposition to motion for extension of time by Ford to respond to sanctions motion
6/25/2017	John Tangren	\$725.00	2.00	1.00	\$725.00	Review and revise response to motion for extension
6/26/2017	Adam Levitt	\$950.00	2.00	1.00	\$950.00	Reviewed and revised response in opposition to extension motion; conducted research re same; discussed and engaged in follow up re same
6/26/2017	Amy Keller	\$675.00	2.20	1.10	\$742.50	Final revisions to draft opposition to extension motion; Circulate edits
6/26/2017	John Tangren	\$725.00	1.60	0.80	\$580.00	Discuss and revise response to motion for extension; exchange correspondence with co-counsel re response to motion for extension
9/2/2017	John Tangren	\$725.00	0.20	0.10	\$72.50	Review correspondence from co-counsel re response to sanctions motion
9/13/2017	John Tangren	\$725.00	0.20	0.10	\$72.50	Review recent filings re redacted response to sanctions motion
9/15/2017	Adam Levitt	\$950.00	0.20	0.10	\$95.00	Followed up on sanctions motion; corresponded with co-counsel re same
10/4/2017	John Tangren	\$725.00	0.10	0.05	\$36.25	Exchange correspondence with co-counsel re reply in support of sanctions motion
10/6/2017	Adam Levitt	\$950.00	0.10	0.05	\$47.50	Followed up on sanctions reply
10/9/2017	John Tangren	\$725.00	2.90	1.45	\$1,051.25	Draft and conduct legal research re sanctions motion reply

**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
10/11/2017	John Tangren	\$725.00	2.20	1.10	\$797.50	Draft and conduct legal research re sanctions motion reply
10/14/2017	John Tangren	\$725.00	0.90	0.45	\$326.25	Exchange correspondence with co-counsel re sanctions reply; draft reply in support of sanctions motion
10/15/2017	John Tangren	\$725.00	0.40	0.20	\$145.00	Draft reply in support of sanctions motion
10/16/2017	John Tangren	\$725.00	2.40	1.20	\$870.00	Prepare for and conduct teleconference with expert re affidavit for sanctions motion reply; draft reply in support of sanctions motion
10/17/2017	John Tangren	\$725.00	2.90	1.45	\$1,051.25	Review and exchange correspondence with co-counsel re research for sanctions motion reply; discuss sanctions motion reply; draft reply in support of sanctions motion; exchange correspondence with expert re affidavit for sanctions reply
10/18/2017	John Tangren	\$725.00	10.20	5.10	\$3,697.50	Draft and exchange correspondence with co-counsel re reply in support of sanctions motion; conduct teleconference and exchange correspondence with expert re affidavit for sanctions reply; review and comment on draft expert affidavit for sanctions reply
10/19/2017	Adam Levitt	\$950.00	0.80	0.40	\$380.00	Reviewed close to final draft of sanctions reply; corresponded with co-counsel re same
10/19/2017	John Tangren	\$725.00	4.40	2.20	\$1,595.00	Discuss and exchange correspondence with co-counsel re reply in support of sanctions motion; revise expert affidavit in support of sanctions reply; conduct teleconference and exchange correspondence with expert re expert affidavit in support of sanctions reply; revise sanctions reply



**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
10/20/2017	Adam Levitt	\$950.00	0.70	0.35	\$332.50	Received and began reviewing as filed iteration of sanctions reply; discussed same
10/20/2017	Audree Lebdjiri	\$275.00	3.00	1.50	\$412.50	Prepare exhibits and formatting of document for filing of Plaintiffs' Reply in Support of Their Motion regarding FMC's Misconduct. Perform ECF filing regarding same
10/20/2017	John Tangren	\$725.00	3.70	1.85	\$1,341.25	Discuss and revise reply in support of sanctions motion; draft and discuss motion for leave to file reply in support of sanctions motion under seal; conduct teleconferences and exchange correspondence with co-counsel re reply in support of sanctions motion; prepare reply in support of sanctions motion for filing
11/11/2017	John Tangren	\$725.00	1.50	0.75	\$543.75	Review and analyze defendant's motion to file surreply; review correspondence from co-counsel re defendant's motion to file surreply
11/12/2017	John Tangren	\$725.00	3.20	1.60	\$1,160.00	Draft and revise opposition to defendant's motion to file surreply
11/13/2017	Audree Lebdjiri	\$275.00	0.50	0.25	\$68.75	Perform ECF filing of Plaintiffs' opposition to motion to file surreply
11/13/2017	John Tangren	\$725.00	5.50	2.75	\$1,993.75	Revise opposition to defendant's motion to file surreply; discuss and exchange correspondence with co-counsel re opposition to defendant's motion to file surreply
11/14/2017	Adam Levitt	\$950.00	1.40	0.70	\$665.00	Participated in conference call with court re appointment of Professor Sanders and related matters; reviewed draft order re same; engaged in follow up relating thereto

**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
11/14/2017	John Tangren	\$725.00	4.30	2.15	\$1,558.75	Discuss and prepare for upcoming teleconference with court re sanctions motion; conduct teleconference with court re sanctions motion; prepare for and conduct teleconference with defense counsel re materials for technical advisor; prepare materials for technical advisor; revise joint filing re materials for technical advisor
11/15/2017	John Tangren	\$725.00	1.90	0.95	\$688.75	Review and exchange correspondence with defense counsel and co-counsel re joint list of materials for technical advisor; revise joint list of materials for technical advisor
11/16/2017	Adam Levitt	\$950.00	0.60	0.30	\$285.00	Corresponded with Ford's counsel and co-counsel re structure and content of sur-reply and response thereto; reviewed order re same; follow up correspondence relating thereto
11/16/2017	John Tangren	\$725.00	1.90	0.95	\$688.75	Exchange correspondence with defense counsel and co-counsel re materials for technical advisor; prepare materials for technical advisor; discuss and review order granting motion for surreply
11/17/2017	Adam Levitt	\$950.00	0.60	0.30	\$285.00	Corresponded with co-counsel and opposing counsel re sur reply matters; engaged in follow up with Niall Paul re same
11/17/2017	John Tangren	\$725.00	0.30	0.15	\$108.75	Exchange correspondence with co-counsel re sanctions surreply
11/20/2017	Adam Levitt	\$950.00	0.40	0.20	\$190.00	Followed up on sur-reply issues; reviewed materials re same; reviewed notes relating thereto

**DICELLO LEVITT & CASEY LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
11/20/2017	John Tangren	\$725.00	0.70	0.35	\$253.75	Review and exchange correspondence with co-counsel re sanctions surreply
11/21/2017	John Tangren	\$725.00	5.80	2.90	\$2,102.50	Exchange correspondence with co-counsel re response to sanctions surreply; conduct teleconference with expert re response to sanctions surreply; draft response to sanctions surreply
11/22/2017	John Tangren	\$725.00	8.60	4.30	\$3,117.50	Draft response to sanctions surreply; conduct teleconferences with co-counsel re sanctions surreply; exchange correspondence with co-counsel and expert re sanctions surreply
11/24/2017	John Tangren	\$725.00	2.20	1.10	\$797.50	Draft and exchange correspondence with expert and co-counsel re response to sanctions surreply
11/26/2017	John Tangren	\$725.00	1.70	0.85	\$616.25	Revise response to sanctions surreply
11/27/2017	Adam Levitt	\$950.00	0.20	0.10	\$95.00	Reviewed as-filed response to sur reply
11/27/2017	John Tangren	\$725.00	2.70	1.35	\$978.75	Revise response to surreply re motion for sanctions; draft motion and supporting memorandum for leave to file response under seal
<b>Totals</b>				<b>76.35</b>	<b>\$54,805.00</b>	

# Exhibit E

**EDGE CASE RESEARCH TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
4/19/2017	Jacob Nelson	\$250.00	6.00	\$1,500.00	File preparation and meeting
4/20/2017	Aaron Kane	\$350.00	3.50	\$1,225.00	Source code review and analysis
4/20/2017	Jacob Nelson	\$250.00	5.50	\$1,375.00	File preparation and meeting
4/20/2017	Ryan McNulty	\$200.00	7.50	\$1,500.00	Meeting and standards review
4/21/2017	Aaron Kane	\$350.00	3.00	\$1,050.00	Source code review and analysis
4/21/2017	Jacob Nelson	\$250.00	3.00	\$750.00	Source code review and analysis
4/24/2017	Aaron Kane	\$350.00	5.00	\$1,750.00	Source code review and analysis
4/24/2017	Zach Rousselle	\$250.00	3.00	\$750.00	Source code review and analysis
4/24/2017	Zach Rousselle	\$250.00	2.00	\$500.00	Source code review and analysis
4/25/2017	Aaron Kane	\$350.00	8.00	\$2,800.00	Source code review and analysis
4/25/2017	Jacob Nelson	\$250.00	4.25	\$1,062.50	Source code review and analysis
4/25/2017	Justin Ray	\$350.00	1.00	\$350.00	Planning meeting
4/26/2017	Aaron Kane	\$350.00	5.50	\$1,925.00	Source code review and analysis
4/26/2017	Jacob Nelson	\$250.00	7.00	\$1,750.00	Source code review and analysis
4/26/2017	Justin Ray	\$350.00	8.00	\$2,800.00	Source code review and analysis
4/26/2017	Ryan McNulty	\$200.00	4.00	\$800.00	Source code review and analysis
4/27/2017	Aaron Kane	\$350.00	4.75	\$1,662.50	Source code review and analysis
4/27/2017	Jacob Nelson	\$250.00	6.50	\$1,625.00	Source code review and analysis
4/27/2017	Ryan McNulty	\$200.00	7.75	\$1,550.00	Source code review and analysis
4/28/2017	Aaron Kane	\$350.00	7.00	\$2,450.00	Source code review and analysis
4/28/2017	Jacob Nelson	\$250.00	8.00	\$2,000.00	Source code review and analysis
4/28/2017	Justin Ray	\$350.00	7.25	\$2,537.50	Source code review and analysis
4/28/2017	Ryan McNulty	\$200.00	6.50	\$1,300.00	Source code review and analysis
5/1/2017	Aaron Kane	\$350.00	7.50	\$2,625.00	Source code review and analysis
5/1/2017	Jacob Nelson	\$250.00	7.00	\$1,750.00	Source code review and analysis and meeting
5/1/2017	Justin Ray	\$350.00	1.00	\$350.00	Source code review and analysis

**EDGE CASE RESEARCH TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
5/1/2017	Ryan McNulty	\$200.00	6.25	\$1,250.00	Source code review and analysis
5/2/2017	Aaron Kane	\$350.00	4.50	\$1,575.00	Source code review and analysis
5/2/2017	Jacob Nelson	\$250.00	3.00	\$750.00	Source code review and analysis
5/3/2017	Aaron Kane	\$350.00	8.00	\$2,800.00	Source code review and analysis
5/3/2017	Jacob Nelson	\$250.00	3.00	\$750.00	Source code review and analysis and meetings
5/4/2017	Aaron Kane	\$350.00	4.75	\$1,662.50	Source code review and analysis
5/8/2017	Aaron Kane	\$350.00	5.25	\$1,837.50	Source code review and analysis
<b>Totals</b>			<b>174.25</b>	<b>\$50,362.50</b>	

# Exhibit F

**EDGE CASE RESEARCH EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Description</b>
4/20/2017	\$824.68	2x PC-Lint Licenses
4/25/2017	\$1,995.00	1x Understand Floating License
<b>Total Expenses</b>	<b>\$2,819.68</b>	



# Exhibit G

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
4/3/2015	Adam Levitt	\$950.00	0.2	\$190.00	Followed up on source code protective order issues
4/3/2015	John Tangren	\$725.00	2.8	\$2,030.00	Review and analyze order denying motion for protective order re source code; exchange correspondence with co-counsel re source code protective order; draft protective order re source code
4/4/2015	John Tangren	\$725.00	1.5	\$1,087.50	Draft protective order re source code
4/5/2015	John Tangren	\$725.00	1.7	\$1,232.50	Review correspondence from co-counsel re protective order; draft protective order re source code
4/6/2015	Adam Levitt	\$950.00	0.4	\$380.00	Followed up on source code and protective order issues
4/7/2015	Adam Levitt	\$950.00	0.9	\$855.00	Follow up correspondence with co-counsel re source code issues; corresponded with prospective consultant re source code issues; corresponded re scheduling re same
4/7/2015	John Tangren	\$725.00	0.2	\$145.00	Revise protective order re source code
4/8/2015	Adam Levitt	\$950.00	0.2	\$190.00	Corresponded with co-counsel re source code issues
4/9/2015	Adam Levitt	\$950.00	0.1	\$95.00	Corresponded with co-counsel re source code; reviewed notes re same
4/10/2015	Adam Levitt	\$950.00	1.1	\$1,045.00	Conference call re source code issues; engaged in follow up re same; correspond re source code issues; engaged in follow up relating thereto
4/10/2015	John Tangren	\$725.00	0.4	\$290.00	Conduct teleconference and exchange correspondence with co-counsel re source code production
4/13/2015	Adam Levitt	\$950.00	0.8	\$760.00	Followed up on source code issues; corresponded with co-counsel re same; corresponded with consultant re same; follow up correspondence re same

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
4/13/2015	John Tangren	\$725.00	0.2	\$145.00	Prepare for teleconference with experts re source code review; review correspondence from defense counsel and co-counsel re source code production
4/14/2015	Adam Levitt	\$950.00	0.5	\$475.00	Followed up on source code issues and conference call with experts re same; discussed open issues
4/14/2015	John Tangren	\$725.00	0.5	\$362.50	Prepare for and conduct teleconference with experts re production of source code; exchange correspondence with experts and co-counsel re source code protective order
4/15/2015	Adam Levitt	\$950.00	0.4	\$380.00	Followed up on source code issues; corresponded with co-counsel re same; received and began reviewing revised source code protocol
4/15/2015	John Tangren	\$725.00	0.3	\$217.50	Exchange correspondence with co-counsel and experts re source code review
4/16/2015	John Tangren	\$725.00	0.1	\$72.50	Review correspondence from defense counsel and co-counsel re production of source code
4/17/2015	John Tangren	\$725.00	0.1	\$72.50	Review correspondence from defense counsel re production of source code
4/20/2015	Adam Levitt	\$950.00	0.1	\$95.00	Corresponded with co-counsel re source code issues
4/20/2015	John Tangren	\$725.00	0.8	\$580.00	Prepare for teleconference with co-counsel re source code; revise source code protocol
4/21/2015	Adam Levitt	\$950.00	0.4	\$380.00	Participated in conference call re source code issues; followed up on open issues relating thereto
4/21/2015	John Tangren	\$725.00	0.3	\$217.50	Prepare for and conduct teleconference with co-counsel re source code

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
4/22/2015	John Tangren	\$725.00	0.4	\$290.00	Conduct teleconference with co-counsel re source code protective order; revise and discuss source code protective order
4/23/2015	Adam Levitt	\$950.00	0.5	\$475.00	Followed up on source code protocol issues; reviewed materials re same
4/23/2015	John Tangren	\$725.00	1.6	\$1,160.00	Exchange correspondence with co-counsel re source code protective order; conduct legal research for submission re source code protective order; revise source code protective order; prepare for upcoming meeting re source code
4/24/2015	John Tangren	\$725.00	0.1	\$72.50	Prepare for teleconference with defense counsel re source code protective order
4/26/2015	Adam Levitt	\$950.00	0.3	\$285.00	Followed up on source code related issues; corresponded with co-counsel re same
4/26/2015	John Tangren	\$725.00	0.2	\$145.00	Prepare for teleconference with defense counsel re source code protective order
4/27/2015	Adam Levitt	\$950.00	1.6	\$1,520.00	Participated in precall re source code; reviewed source code protocols; participated in meet and confer with opposing counsel re source code; engaged in follow up re same; discussed source code; teleconference with source code expert; engaged in follow up correspondence re same
4/27/2015	John Tangren	\$725.00	1.7	\$1,232.50	Prepare for meeting with experts re source code; prepare for and conduct teleconference with defense counsel re source code protocol
4/28/2015	Adam Levitt	\$950.00	0.2	\$190.00	Corresponded with co-counsel related to source code matters; reviewed notes relating thereto
5/4/2015	John Tangren	\$725.00	1.2	\$870.00	Prepare for meeting with experts re source code

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
5/5/2015	Adam Levitt	\$950.00	0.3	\$285.00	Confirmed expert meetings and source code hearing; corresponded with co-counsel re same
5/5/2015	John Tangren	\$725.00	0.1	\$72.50	Review memorandum from expert re source code
5/7/2015	Adam Levitt	\$950.00	0.1	\$95.00	Corresponded with co-counsel re source code; engaged in follow up re same
5/7/2015	John Tangren	\$725.00	0.4	\$290.00	Prepare for meeting with experts re source code
5/10/2015	John Tangren	\$725.00	0.1	\$72.50	Prepare for meeting with experts re source code
5/12/2015	Adam Levitt	\$950.00	0.3	\$285.00	Followed up on source code issues with co-counsel; engaged in follow up re same
5/12/2015	John Tangren	\$725.00	0.5	\$362.50	Prepare for meeting with experts re source code
5/13/2015	Adam Levitt	\$950.00	0.1	\$95.00	Continue preparing for source code meeting
5/14/2015	Adam Levitt	\$950.00	0.2	\$190.00	Prepared for upcoming source code meeting
5/14/2015	John Tangren	\$725.00	0.3	\$217.50	Discuss upcoming hearing re source code; prepare for upcoming meeting with experts re source code
5/15/2015	Adam Levitt	\$950.00	13.0	\$12,350.00	Round trip travel for meeting with source code experts; participated in meeting; engaged in follow up re same
5/15/2015	John Tangren	\$725.00	17.5	\$12,687.50	Travel to and from meeting with experts and co-counsel re source code; conduct meeting with experts and co-counsel re source code
5/16/2015	Adam Levitt	\$950.00	0.4	\$380.00	Corresponded with co-counsel re source code; engaged in follow up relating thereto; followed up with source code consultants re meeting; engaged in follow up relating thereo
5/16/2015	John Tangren	\$725.00	2.0	\$1,450.00	Travel from meeting with experts and co-counsel re source code; exchange correspondence with co-counsel re recent meeting with experts

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
5/18/2015	Adam Levitt	\$950.00	0.4	\$380.00	Followed up on source code matters; follow up correspondence with prospective source code experts
5/18/2015	John Tangren	\$725.00	0.2	\$145.00	Discuss recent meeting with experts re source code
5/19/2015	Adam Levitt	\$950.00	0.7	\$665.00	Followed up with co-counsel re source code hearing; followed up on expert related matters pertaining thereto; drafted and revised notice of intent to have expert testimony; corresponded with co-counsel relating thereto
5/19/2015	John Tangren	\$725.00	0.3	\$217.50	Discuss and exchange correspondence with co-counsel re notice of witness at hearing; review correspondence from co-counsel and experts re upcoming source code hearing
5/20/2015	Adam Levitt	\$950.00	0.8	\$760.00	Corresponded with experts and co-counsel re source code hearing; engaged in follow up re same; followed up on source code briefing; reviewed file and notes relating thereto
5/21/2015	Adam Levitt	\$950.00	0.7	\$665.00	Corresponded with co-counsel re source code issues; followed up on source code materials; reviewed notes re same
5/22/2015	Adam Levitt	\$950.00	0.8	\$760.00	Corresponded with co-counsel re source code hearing prep and hearing related issues; received and began reviewing Ford's source code brief; discussed and engaged in follow up re same
5/22/2015	John Tangren	\$725.00	1.0	\$725.00	Prepare for upcoming hearing re source code; review and discuss defendant's memorandum re source code; review correspondence from co-counsel re upcoming hearing
5/23/2015	Adam Levitt	\$950.00	1.1	\$1,045.00	Continued reviewing source code memo; corresponded with co-counsel re same; began framing out response; reviewed notes relating thereto

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
5/23/2015	John Tangren	\$725.00	0.2	\$145.00	Discuss defendant's brief re source code
5/24/2015	Adam Levitt	\$950.00	1.4	\$1,330.00	Began reviewing initial response draft to Ford's source code memo; reviewed materials re same; corresponded with co-counsel relating thereto; continued reviewing Ford's source code issues
5/24/2015	John Tangren	\$725.00	0.2	\$145.00	Prepare for upcoming source code hearing; exchange correspondence with co-counsel re source code submission
5/25/2015	Adam Levitt	\$950.00	2.2	\$2,090.00	Reviewed and revised source code brief; conducted research re same; corresponded with co-counsel relating thereto
5/25/2015	John Tangren	\$725.00	3.3	\$2,392.50	Revise and discuss source code submission
5/26/2015	Adam Levitt	\$950.00	0.6	\$570.00	Reviewed final iteration of response to source code briefing; began preparing for upcoming source code hearing; corresponded with co-counsel re same
5/26/2015	John Tangren	\$725.00	1.0	\$725.00	Review correspondence from co-counsel and experts re source code submission; prepare for upcoming source code hearing
5/27/2015	Adam Levitt	\$950.00	13.0	\$12,350.00	Travel to WV for source code hearing; hearing prep meeting with source code consultant; reviewed materials, outlined argument; engaged in follow up re same
5/27/2015	John Tangren	\$725.00	12.7	\$9,207.50	Travel to upcoming hearing; prepare for upcoming hearing
5/28/2015	Adam Levitt	\$950.00	12.0	\$11,400.00	Traveled to Huntington WV for source code hearing; prepared for and engaged in hearing; engaged in follow up meetings and correspondence re same; return travel to Chicago

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
5/28/2015	John Tangren	\$725.00	13.1	\$9,497.50	Prepare for status hearing re source code; attend status hearing re source code; meet with experts and co-counsel re source code; travel from hearing
6/12/2015	Adam Levitt	\$950.00	0.8	\$760.00	Received and began reviewing source code order; follow up correspondence with expert and co-counsel re same
6/12/2015	John Tangren	\$725.00	0.9	\$652.50	Review and analyze source code order; exchange correspondence with co-counsel and experts re source code order
6/19/2015	John Tangren	\$725.00	0.4	\$290.00	Exchange correspondence with co-counsel re source code protective order; review defendants' proposed source code protective order
6/20/2015	Adam Levitt	\$950.00	0.2	\$190.00	Continued reviewing proposed protective order
6/21/2015	Adam Levitt	\$950.00	0.8	\$760.00	Reviewed and annotated source code order; follow up correspondence with co-counsel re same
6/21/2015	John Tangren	\$725.00	0.3	\$217.50	Exchange correspondence with co-counsel re source code protective order
6/24/2015	John Tangren	\$725.00	1.4	\$1,015.00	Conduct teleconference with defense counsel and co-counsel re source code protective order
6/26/2015	John Tangren	\$725.00	1.0	\$725.00	Review and analyze defendant's proposed source code protocol
6/27/2015	Adam Levitt	\$950.00	1.5	\$1,425.00	Participated in meet and confer teleconference with opposing counsel re source code protocol; engaged in follow-up re same
6/27/2015	John Tangren	\$725.00	1.8	\$1,305.00	Prepare for teleconference with co-counsel and experts re source code protocol; conduct teleconferences with defense counsel, co-counsel, and experts re source code protocol



**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
7/1/2015	Adam Levitt	\$950.00	2.3	\$2,185.00	Participated in precall and meet and confer on source code protocol; followed up with expert and co-counsel re same; followed up with opposing counsel; corresponded with co-counsel re open issues pertaining to review room source code
7/1/2015	John Tangren	\$725.00	2.8	\$2,030.00	Prepare for and conduct teleconferences with defense counsel and co-counsel re source code protective order
7/2/2015	Adam Levitt	\$950.00	0.8	\$760.00	Prepared for and participated in conf call with experts re source code protective order; engaged in follow up re same
7/2/2015	John Tangren	\$725.00	1.7	\$1,232.50	Prepare for and conduct teleconferences with defense counsel and experts re source code protective order
7/4/2015	Adam Levitt	\$950.00	1.0	\$950.00	Followed up on protective order issues; reviewed, revised and mark up defendant's revised source code order; corresponded with co-counsel re same
7/11/2015	Adam Levitt	\$950.00	2.2	\$2,090.00	Participated in meet and confer conf call with opposing counsel re source code protocol; engaged in follow up relating thereto
7/11/2015	John Tangren	\$725.00	2.0	\$1,450.00	Prepare for and conduct teleconference with defense counsel and experts re source code protocol; exchange correspondence with co-counsel and expert re source code protocol
7/14/2015	Adam Levitt	\$950.00	0.3	\$285.00	Followed up re source code protocol; corresponded re same
7/27/2015	John Tangren	\$725.00	0.1	\$72.50	Discuss source code protective order

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
7/31/2015	Adam Levitt	\$950.00	0.7	\$665.00	Reviewed defendant's correspondence re source code protective order; engaged in follow up with co-counsel re same
7/31/2015	John Tangren	\$725.00	0.1	\$72.50	Review and discuss correspondence from defense counsel re source code protective order
8/2/2015	John Tangren	\$725.00	0.2	\$145.00	Prepare for teleconference with expert and co-counsel re source code protective order
8/3/2015	Adam Levitt	\$950.00	0.6	\$570.00	Prepared for and participated in conference call re source code protective order; engaged in follow up re same; corresponded with co-counsel relating thereto
8/3/2015	John Tangren	\$725.00	0.9	\$652.50	Review correspondence from co-counsel re source code protective order; prepare for and conduct teleconference with co-counsel re source code protective order
8/4/2015	Adam Levitt	\$950.00	0.5	\$475.00	Received and began reviewing revised source code order; engaged in follow up relating thereto
8/5/2015	John Tangren	\$725.00	6.5	\$4,712.50	Draft submission to court re source code protective order; conduct teleconference and exchange correspondence with co-counsel re submission to court re source code protective order
8/6/2015	John Tangren	\$725.00	0.1	\$72.50	Discuss source code protective order submissions
8/17/2015	John Tangren	\$725.00	0.2	\$145.00	Review correspondence to court re source code protective order
9/16/2015	Adam Levitt	\$950.00	1.1	\$1,045.00	Prepared for and participated in prehearing calls and participated in discovery hearing with Magistrate Judge Eifert; engaged in follow up re same

**GRANT & EISENHOFER P.A. TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
9/18/2015	Adam Levitt	\$950.00	0.8	\$760.00	Revised and finalized follow up source code letter to Judge Eifert; reviewed exhibit re same
9/22/2015	Adam Levitt	\$950.00	0.5	\$475.00	Reviewed discovery order; corresponded with co-counsel relating thereto
<b>Totals</b>			<b>157.30</b>	<b>\$129,770.00</b>	

# Exhibit H

**GRANT & EISENHOFER P.A. EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Description</b>
5/15/2015	\$1,070.91	Levitt trip to Maryland for source code meeting
5/15-5/16/2015	\$1,042.67	Tangren trip to Maryland for source code meeting
5/27-5/28/2015	\$1,257.19	Levitt trip to West Virginia for source code hearing
5/27-5/28/2015	\$953.51	Tangren trip to West Virginia for source code hearing
<b>Total Expenses</b>	<b>\$4,324.28</b>	

# Exhibit I

**ISAAC WILES BURKHOLDER & TEETOR, LLC TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/18/2017	Mark Troutman	\$425.00	0.40	0.20	\$85.00	Review/evaluation of sanctions motion and exhibits re impact on current litigation and add'l motions
6/19/2017	Shawn Judge	\$400.00	0.60	0.30	\$120.00	Review and discuss sanctions motion
6/22/2017	Mark Troutman	\$425.00	0.90	0.45	\$191.25	Reviewed Ford's motion for extension of time to respond to motion for sanctions; Outlined response
6/28/2017	Mark Troutman	\$425.00	0.20	0.10	\$42.50	Reviewed Ford's Reply re extension for sanctions motion
10/22/2017	Mark Troutman	\$425.00	0.40	0.20	\$85.00	Reviewed and analyzed issues and impact w/ reply in support of Plaintiffs' motion for sanctions
11/13/2017	Greg Travalio	\$495.00	0.20	0.10	\$49.50	Final review of surreply motion
11/20/2017	Mark Troutman	\$425.00	0.30	0.15	\$63.75	Reviewed Ford's surreply in opposition of Plaintiffs' motion for sanctions
11/24/2017	Greg Travalio	\$495.00	0.60	0.30	\$148.50	Edits and comment to surreply
11/25/2017	Mark Troutman	\$425.00	0.20	0.10	\$42.50	Overview of reply briefing re sanctions motion
<b>Totals</b>				<b>1.90</b>	<b>\$828.00</b>	

# Exhibit J



**KOOPMAN TIME**

<b>Billing Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
2/17/2017	Philip Koopman	\$580.00	2.00	2.00	\$1,160.00	Secure room travel time
2/27/2017	Philip Koopman	\$580.00	10.60	10.60	\$6,148.00	Secure room travel time
3/6/2017	Philip Koopman	\$580.00	8.35	8.35	\$4,843.00	Secure room travel time
4/29/2017	Philip Koopman	\$580.00	95.40	9.54	\$5,533.20	Preparation of expert reports
5/5/2017	Philip Koopman	\$580.00	71.20	7.12	\$4,129.60	Preparation of expert reports
5/12/2017	Philip Koopman	\$580.00	81.70	8.17	\$4,738.60	Preparation of expert reports
5/18/2017	Philip Koopman	\$580.00	67.00	6.70	\$3,886.00	Preparation of expert reports
5/24/2017	Philip Koopman	\$580.00	57.90	5.79	\$3,358.20	Preparation of expert reports
5/25/2017	Philip Koopman	\$580.00	7.30	7.30	\$4,234.00	Secure room travel time
5/27/2017	Philip Koopman	\$580.00	9.70	0.97	\$562.60	Preparation of expert reports
6/2/2017	Philip Koopman	\$580.00	45.30	4.53	\$2,627.40	Preparation of expert reports
6/9/2017	Philip Koopman	\$580.00	73.60	7.36	\$4,268.80	Preparation of expert reports
6/15/2017	Philip Koopman	\$580.00	96.70	9.67	\$5,608.60	Preparation of expert reports
6/16/2017	Philip Koopman	\$580.00	3.90	1.95	\$1,131.00	Sanctions briefing support
6/22/2017	Philip Koopman	\$580.00	3.20	3.20	\$1,856.00	Review and analysis of source code emails
6/27/2017	Philip Koopman	\$580.00	2.50	0.25	\$145.00	Preparation of expert reports
7/29/2017	Philip Koopman	\$580.00	52.00	5.20	\$3,016.00	Prepare for and give deposition
8/4/2017	Philip Koopman	\$580.00	2.80	1.40	\$812.00	Sanctions briefing support
8/23/2017	Philip Koopman	\$580.00	19.60	1.96	\$1,136.80	Prepare for and give deposition
9/2/2017	Philip Koopman	\$580.00	0.40	0.20	\$116.00	Sanctions briefing support
11/25/2017	Philip Koopman	\$580.00	20.80	10.40	\$6,032.00	Sanctions briefing support
<b>Totals</b>				<b>112.66</b>	<b>\$65,342.80</b>	

# Exhibit K

**KOOPMAN EXPENSES**

<b>Billing Date</b>	<b>Amount</b>	<b>Description</b>
2/17/2017	\$1,292.90	Secure room travel expenses
2/27/2017	\$375.04	Personal vehicle miles for secure room trip
2/27/2017	\$1,189.10	Secure room travel expenses
3/6/2017	\$1,681.11	Secure room travel expenses
5/25/2017	\$1,081.84	Secure room travel expenses
<b>Total Expenses</b>	<b>\$5,619.99</b>	

# Exhibit L

**SLAVIK LAW TIME**

<b>Date</b>	<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Amount</b>	<b>Description</b>
8/3/2015	Donald Slavik	\$700.00	5.30	\$3,710.00	Conf w/co-counsel re source code PO, review pre-draft PO, email & call w/co-counsel
8/5/2015	Donald Slavik	\$700.00	3.90	\$2,730.00	Read transcripts re source code; review Ford PO, Plaintiffs' PO, draft letter to Court
8/15/2015	Donald Slavik	\$700.00	2.30	\$1,610.00	Research Toyota source code order, defect findings
8/16/2015	Donald Slavik	\$700.00	0.80	\$560.00	Research, edit proposed PO
8/28/2015	Donald Slavik	\$700.00	0.20	\$140.00	Calls re source code protective order
9/4/2015	Donald Slavik	\$700.00	1.20	\$840.00	Review Ford Protective Order
9/7/2015	Donald Slavik	\$700.00	2.10	\$1,470.00	Review protective orders, memo to co-counsel
9/16/2015	Donald Slavik	\$700.00	2.20	\$1,540.00	Prep for hearing, hearing with Court, post-hearing conf w/co-counsel
9/22/2015	Donald Slavik	\$700.00	0.40	\$280.00	Review court order, follow-up code review
10/6/2015	Donald Slavik	\$700.00	8.00	\$5,600.00	Travel to Detroit for code review
10/7/2015	Donald Slavik	\$700.00	4.80	\$3,360.00	Code facility "walk through", report to PSC re code room
2/12/2016	Donald Slavik	\$700.00	0.80	\$560.00	Emails re security, guard, code
2/25/2016	Donald Slavik	\$700.00	0.60	\$420.00	Manage code room
5/6/2016	Donald Slavik	\$700.00	0.40	\$280.00	Secure room access
5/8/2016	Donald Slavik	\$700.00	0.10	\$70.00	Respond to Schebel re SC room access
5/16/2016	Donald Slavik	\$700.00	4.50	\$3,150.00	Travel to DTW for SC meetings
5/18/2016	Donald Slavik	\$700.00	5.30	\$3,710.00	Travel DTW-SNA
6/8/2016	Donald Slavik	\$700.00	0.40	\$280.00	Handling moving safe to new secure room
6/13/2016	Donald Slavik	\$700.00	0.50	\$350.00	Calls, emails with Loudon and Schebel re safe cable
10/3/2016	Donald Slavik	\$700.00	1.00	\$700.00	Source code review setup
10/4/2016	Donald Slavik	\$700.00	0.40	\$280.00	Arrange code review security
10/18/2016	Donald Slavik	\$700.00	0.50	\$350.00	Emails re source code scheduling
12/8/2016	Donald Slavik	\$700.00	0.30	\$210.00	Call and email re room guard

**SLAVIK LAW TIME**

2/16/2017	Donald Slavik	\$700.00	4.20	\$2,940.00	Travel to DTW
2/17/2017	Donald Slavik	\$700.00	6.00	\$4,200.00	Travel
2/28/2017	Donald Slavik	\$700.00	0.80	\$560.00	Reset docs for room
3/2/2017	Donald Slavik	\$700.00	0.50	\$350.00	Letter to Schebel re docs not deposited
5/4/2017	Donald Slavik	\$700.00	0.50	\$350.00	Conf re source code email search
5/5/2017	Donald Slavik	\$700.00	0.50	\$350.00	Call re source code emails
5/5/2017	Kathy Kuryak	\$165.00	3.00	\$495.00	Search for source code emails
5/9/2017	Donald Slavik	\$700.00	0.50	\$350.00	Data removal prep with defense, conf re bug code file searches
5/11/2017	Donald Slavik	\$700.00	2.40	\$1,680.00	Calls with Koopman, sending source code emails
5/16/2017	Kathy Kuryak	\$165.00	1.00	\$165.00	Search for source code emails
5/18/2017	Donald Slavik	\$700.00	3.10	\$2,170.00	Emails, calls with Koopman re source code emails
5/20/2017	Donald Slavik	\$700.00	2.80	\$1,960.00	Emails, calls with Koopman
5/26/2017	Kathy Kuryak	\$165.00	5.00	\$825.00	Search for source code emails
5/27/2017	Donald Slavik	\$700.00	0.30	\$210.00	Review work re source code emails
6/4/2017	Donald Slavik	\$700.00	3.20	\$2,240.00	Review PK comments on code production, reports PK TH
6/5/2017	Kathy Kuryak	\$165.00	1.75	\$288.75	Search for source code emails
6/6/2017	Donald Slavik	\$700.00	1.20	\$840.00	Discuss with Koopman, source code email review, KK assignments
6/9/2017	Donald Slavik	\$700.00	0.70	\$490.00	KK re source code files transmittal
6/14/2017	Donald Slavik	\$700.00	0.20	\$140.00	Set up extraction
6/14/2017	Kathy Kuryak	\$165.00	2.00	\$330.00	Search for source code emails
6/23/2017	Donald Slavik	\$700.00	2.00	\$1,400.00	Discussion with KK re source code emails, review files she sends
6/23/2017	Kathy Kuryak	\$165.00	6.25	\$1,031.25	Search for source code emails
6/24/2017	Kathy Kuryak	\$165.00	2.00	\$330.00	Search for source code emails
6/27/2017	Kathy Kuryak	\$165.00	3.75	\$618.75	Search for source code emails
6/29/2017	Kathy Kuryak	\$165.00	2.00	\$330.00	Search for source code emails
6/30/2017	Kathy Kuryak	\$165.00	5.50	\$907.50	Search for source code emails
7/3/2017	Kathy Kuryak	\$165.00	1.00	\$165.00	Search for source code emails
7/4/2017	Kathy Kuryak	\$165.00	1.00	\$165.00	Search for source code emails
7/6/2017	Kathy Kuryak	\$165.00	5.75	\$948.75	Create spreadsheet of source code emails
7/9/2017	Kathy Kuryak	\$165.00	1.00	\$165.00	Create spreadsheet of source code emails

**SLAVIK LAW TIME**

7/10/2017	Kathy Kuryak	\$165.00	5.25	\$866.25	Create spreadsheet of source code emails
7/11/2017	Kathy Kuryak	\$165.00	4.75	\$783.75	Sorted external emails; download/folder email; check for duplicates
8/28/2017	Kathy Kuryak	\$165.00	2.50	\$412.50	Search for source code emails
9/23/2017	Kathy Kuryak	\$165.00	1.25	\$206.25	Search for source code emails
<b>Totals</b>			<b>129.65</b>	<b>\$61,463.75</b>	

# Exhibit M



**SLAVIK LAW EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Description</b>
10/3/2015	\$97.39	Security safe for Ford docs in Dearborn, MI
10/6/2015	\$16.29	Purchase of two padlocks for safe
10/6/2015	\$797.46	Dearborn, MI for Source Code doc review
10/6/2015	\$2.49	Lunch at airport for trip to Detroit
10/6/2015	\$636.04	Dearborn, MI for Source Code doc review
10/6/2015	\$110.91	Dearborn, MI for Source Code doc review
10/6/2015	\$9.30	Dearborn, MI for Source Code doc review
10/7/2015	\$38.00	Dinner w/experts Loudon & Jones
10/8/2015	\$26.47	Lunch w/experts Loudon & Jones
1/27/2016	\$15.00	Lunch w/expert Loudon
1/27/2016	\$306.50	Westin Detroit Metro Airport-mtg w/expert
1/27/2016	\$65.45	Meeting with expert Loudon
1/27/2016	\$7.50	Meeting with expert Loudon
5/16/2016	\$925.20	Dearborn, MI for Scource Code doc review
5/16/2016	\$75.00	Dinner mtg w/expert Loudon re code
5/17/2016	\$14.16	Lunch mtg w/expert Loudon re code
5/17/2016	\$4.00	Tip housekeeping
5/17/2016	\$5.00	Tip valet Andiamo's
5/18/2016	\$351.40	Hotel TownePlace Suites Marriott
5/18/2016	\$5.00	Hertz shuttle driver
5/18/2016	\$168.56	Hertz rental car
5/18/2016	\$3.20	gas for rental car
6/20/2016	\$557.60	UA HDN-DEN-DTW
6/20/2016	\$28.25	to from airport 50 miles
6/20/2016	\$16.24	airport cafe
6/20/2016	\$8.99	on board flight DEN-DTW

**SLAVIK LAW EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Description</b>
6/21/2016	\$169.60	Embassy Suites
6/21/2016	\$2.00	driver hotel to airport
6/30/2016	\$516.00	UA HDN-DEN-MKE
6/30/2016	\$18.79	meal enroute to MKE
1/31/2017	\$295.32	Hilton Garden Inn-mtg w/Loudon in secure room
1/31/2017	\$14.51	Uber to visit expert Loudon in secure room
2/17/2017	\$93.00	Go Alpine to Steamboat
2/17/2017	\$10.00	tip o Alpine driver
2/17/2017	\$225.50	Marriott Hotel Romulus MI
7/17/2017	\$60.00	Reliable Delivery, SC report B&B to Loudon
7/20/2017	\$266.13	Hilton Garden Inn
<b>Total Expenses</b>	<b>\$5,962.25</b>	

# Exhibit N

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
4/3/2015	Kelly B. Griffith	\$260.00	0.10	0.10	\$26.00	correspondence regarding source code
						protective order
4/7/2015	Nathan B. Atkinson	\$400.00	1.50	1.50	\$600.00	Revise Protective Order regarding
						Source Code
4/13/2015	Nathan B. Atkinson	\$400.00	2.50	2.50	\$1,000.00	Phone call with Bonasso regarding extension
						of time to prepare proposed Source Code
						Protective order; Work on issues related to Source
						Code and protective order
5/22/2015	Niall A. Paul	\$500.00	6.30	6.30	\$3,150.00	Receipt and review of Ford's Memorandum
						Regarding Source Code Protective Order;
						Receipt and Review of Ford's Notice of Intent
						to Cross Examine Plaintiffs' Demonstrator
						Witness Nigel Jones; communicate with
						co-counsel and experts regarding same
5/26/2015	Nathan B. Atkinson	\$400.00	3.00	3.00	\$1,200.00	Work on issues related to source code and
						upcoming hearing; Revise Plaintiffs'
						Memorandum in Support of Production of Source
						Code
5/27/2015	Niall A. Paul	\$500.00	8.00	8.00	\$4,000.00	Prepare for hearing before Judge Eifert

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						regarding Source Code; Meet with Nigel Jones,
						Adam Levitt, John Tangren, and Lee Javins
						regarding same
5/27/2015	Kelly B. Griffith	\$260.00	2.00	2.00	\$520.00	Prepare for Thursday hearing
5/27/2015	Margaret C. Coppley	\$270.00	1.20	1.20	\$324.00	assist with preparation for court hearing
5/28/2015	Nathan B. Atkinson	\$400.00	3.50	3.50	\$1,400.00	Source code hearing
5/28/2015	Kelly B. Griffith	\$260.00	3.50	3.50	\$910.00	Attend hearing on source code and planned
						status conference (including travel)
5/28/2015	Niall A. Paul	\$500.00	12.00	12.00	\$6,000.00	Prepare for and attend hearing before Judge
						Eifert regarding Source Code Protective Order
6/8/2015	Nathan B. Atkinson	\$400.00	2.80	2.80	\$1,120.00	Work on source code brief and response
						regarding Ford position on issues including
						tools and access to source code
7/2/2015	Niall A. Paul	\$500.00	3.75	3.75	\$1,875.00	review and consider draft of Agreed
						Protective Order Governing Source Code;
						communicate with co-counsel and opposing
						counsel regarding same

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
8/3/2015	Nathan B. Atkinson	\$400.00	2.00	2.00	\$800.00	Phone conference with team regarding source code
						negotiations and order
8/3/2015	Niall A. Paul	\$500.00	2.80	2.80	\$1,400.00	Continued work on Source Code Protective
						Order
8/5/2015	Nathan B. Atkinson	\$400.00	4.00	4.00	\$1,600.00	Work on issues related to source code,
						including review and comments to drafts and
						emails
8/11/2015	Niall A. Paul	\$500.00	1.50	1.50	\$750.00	Receipt and review of letter to Judge Eifert
						from Jodi Munn Schebel regarding source code
						filing
8/12/2015	Nathan B. Atkinson	\$400.00	2.00	2.00	\$800.00	Review and analyze source code letter from
						Ford to Eifert; Consider response
8/12/2015	Niall A. Paul	\$500.00	3.80	3.80	\$1,900.00	Continued work on Source Code issues
8/14/2015	Niall A. Paul	\$500.00	2.80	2.80	\$1,400.00	Work on issues regarding source code
8/17/2015	Niall A. Paul	\$500.00	12.50	12.50	\$6,250.00	Review and revise letter to Judge Eifert
						regarding Source Code; Revise Agreed
						Protective Order Governing Source Code;
						review side-by-side of Plaintiffs and

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						Defendant's proposed protective orders; and
						prepare for hearing on outstanding motions
						before Judge Eifert
8/24/2015	Niall A. Paul	\$500.00	4.00	4.00	\$2,000.00	continue to work on Source
						Code Issues; communicate with co-counsel
						regarding same
9/2/2015	Kelly B. Griffith	\$260.00	3.00	3.00	\$780.00	Prepare for and participate in bi-weekly
						Discovery conference; develop strategy for
						letter argument to Court
9/2/2015	Nathan B. Atkinson	\$400.00	3.30	3.30	\$1,320.00	Prepare for and attend discovery conference
						with Judge Eifert
9/9/2015	Niall A. Paul	\$500.00	3.50	3.50	\$1,750.00	Continue work on various issues dealing with
						Ford's discovery conduct, including
						source code
9/10/2015	Niall A. Paul	\$500.00	2.50	2.50	\$1,250.00	Continue to work on multiple discovery
						related issues including source code
9/16/2015	Margaret C. Coppley	\$270.00	2.00	2.00	\$540.00	prepare for and attend
						discovery conference with Eifert
9/16/2015	Kelly B. Griffith	\$260.00	2.00	2.00	\$520.00	Prepare for and participate in discovery

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						conference
9/16/2015	Niall A. Paul	\$500.00	2.00	2.00	\$1,000.00	Prepare for and participate in Telephonic
						Discovery Conference with Judge Cheryl
						Eifert; communicate with co-counsel regarding
						same
9/17/2015	Niall A. Paul	\$500.00	4.00	4.00	\$2,000.00	continue to work on issues
						regarding Source Code and outstanding
						discovery
9/18/2015	Niall A. Paul	\$500.00	5.00	5.00	\$2,500.00	Review and revise multiple letters to Judge
						Eifert; review agenda to be provided to Judge
						Chambers; communicate with co-counsel
						regarding same
9/20/2015	Nathan B. Atkinson	\$400.00	4.00	4.00	\$1,600.00	Review correspondence from Ford to Judge
						Eifert; Prepare for hearing with Eifert
9/21/2015	Nathan B. Atkinson	\$400.00	1.00	1.00	\$400.00	Prepare for and attend conference with Judge
						Eifert
9/21/2015	Kelly B. Griffith	\$260.00	1.00	1.00	\$260.00	Prepare for and participate in discovery
						conference
9/21/2015	Niall A. Paul	\$500.00	4.00	4.00	\$2,000.00	Prepare for and participate in telephonic



**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						discovery conference with Judge Eifert;
						debrief with co-counsel regarding same
9/22/2015	Niall A. Paul	\$500.00	2.00	2.00	\$1,000.00	Receipt and review of Order
9/23/2015	Nathan B. Atkinson	\$400.00	2.00	2.00	\$800.00	Review and comment on Eifert Order
6/8/2017	Nathan B. Atkinson	\$400.00	8.00	4.00	\$1,600.00	Meeting with Koopman and co-counsel in
						Pittsburgh; Travel home; Evaluate Motion for
						Sanctions
6/8/2017	Niall A. Paul	\$500.00	8.00	4.00	\$2,000.00	Meet with Phil Koopman and co-counsel in
						Pittsburgh; return travel to Charleston
6/9/2017	Nathan B. Atkinson	\$400.00	5.00	2.50	\$1,000.00	Draft Motion for Sanctions; Work on expert
						reports
6/10/2017	Nathan B. Atkinson	\$400.00	5.00	2.50	\$1,000.00	Work on analysis of Ford misconduct; Prepare
						summary for Koopman review; Work with
						Hanneman on issues related to report
6/11/2017	Nathan B. Atkinson	\$400.00	4.00	2.00	\$800.00	Work on summary of Ford misconduct; Work with
						Hannemann and Koopman

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/12/2017	Andrew J. Darcy	\$185.00	7.00	3.50	\$647.50	Review plaintiff's motion for sanctions for
						ford's source code discovery abuses; research
						intercompany relationships; email
						corresponded regarding conference to outline
						scope of changes necessary; conference
						regarding brief in support of motion
6/13/2017	Nathan B. Atkinson	\$400.00	8.00	4.00	\$1,600.00	Work on Motion for Sanctions
6/14/2017	Nathan B. Atkinson	\$400.00	8.00	4.00	\$1,600.00	Work on Motion for Sanctions
6/15/2017	Nathan B. Atkinson	\$400.00	10.00	5.00	\$2,000.00	Work on Motion for Sanctions
6/15/2017	M. Rebecca Hendrix	\$175.00	1.20	0.60	\$105.00	Research Judge Eifert's opinions re sanctions
						under 37(b)(2); analyze strongest cases to
						cite in Memorandum of Law in Support of
						Motion for Relief
6/15/2017	M. Rebecca Hendrix	\$175.00	0.90	0.45	\$78.75	Research when sanctions are granted when a
						party acts with bad faith in violation of
						orders and conduct is especially egregious to
						support Motion for Relief Related to Ford's
						Discovery Misconduct
6/15/2017	M. Rebecca Hendrix	\$175.00	1.00	0.50	\$87.50	Analyze when sanctions are available 37(b)(2)
						under Southern District of West Virginia

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						precedent to support Motion for Relief
						Related to Ford's Discovery Misconduct
6/15/2017	M. Rebecca Hendrix	\$175.00	0.70	0.35	\$61.25	Research circumstances warranting a sanction
						prohibiting a party from introducing evidence
						it withheld to support Motion for Relief
						Related to Ford's Discovery Misconduct
6/15/2017	M. Rebecca Hendrix	\$175.00	0.80	0.40	\$70.00	Research circumstances warranting a sanction
						designating certain evidence as established
						facts to support Motion for Relief Related to
						Ford's Discovery Misconduct
6/15/2017	M. Rebecca Hendrix	\$175.00	0.70	0.35	\$61.25	Brief overview of case law and procedural
						rules cited in Motion for Relief Related to
						Ford's Discovery Misconduct
6/15/2017	M. Rebecca Hendrix	\$175.00	1.10	0.55	\$96.25	Substantive review of Motion for Relief
						Related to Ford's Discovery Misconduct to
						determine which propositions need additional
						support via an affidavit
6/15/2017	M. Rebecca Hendrix	\$175.00	1.80	0.90	\$157.50	Draft Affidavit of Philip Koopmen in support
						of Motion for Relief Related to Ford's
						Discovery Misconduct

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/15/2017	M. Rebecca Hendrix	\$175.00	0.30	0.15	\$26.25	Emails with NBA re motion for sanctions and affidavit in support
6/15/2017	M. Rebecca Hendrix	\$175.00	0.70	0.35	\$61.25	Research when sanctions, expenses, and attorneys' fees are available absent a meet and confer certification under SDWV law to support Motion for Relief Related to Ford's Discovery Misconduct
6/15/2017	M. Rebecca Hendrix	\$175.00	0.90	0.45	\$78.75	Review draft and revisions of Motion for Relief Related to Ford's Discovery Misconduct
6/15/2017	M. Rebecca Hendrix	\$175.00	1.80	0.90	\$157.50	Revise affidavit of Philip Koopman to include additional facts and improve clarity and structure
6/16/2017	M. Rebecca Hendrix	\$175.00	0.80	0.40	\$70.00	Review and revise Motion for Relief Related to Ford's Discovery Misconduct
6/16/2017	Niall A. Paul	\$500.00	11.50	5.75	\$2,875.00	Review and revise Plaintiffs' Motion for Leave to File Motion, Memorandum, and Exhibits Under Seal, And for Leave to File Publicly-Available Redacted Versions, Where Possible; work on Memo in Support; Review and

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						revise Plaintiffs' Motion for Relief to
						Ford's Discovery Misconduct; work on Memo in
						Support; and Communicate with Co-Counsel
						regarding both
6/16/2017	Sandra D. Burch	\$135.00	8.00	4.00	\$540.00	Assist with motion for sanctions
6/16/2017	Nathan B. Atkinson	\$400.00	2.50	1.25	\$500.00	Work on Motion for Sanctions
6/19/2017	Niall A. Paul	\$500.00	4.00	2.00	\$1,000.00	review Plaintiffs' Memorandum of Law in
						Support of Their Motion for Relief Related to
						Ford's Discovery Misconduct
6/21/2017	Niall A. Paul	\$500.00	3.40	1.70	\$850.00	Receipt and review of Ford's Motion to Extend
						Time to Respond to Plaintiffs' Motion for
						Relief Related to Ford's Discovery
						Misconduct
6/22/2017	Niall A. Paul	\$500.00	2.50	1.25	\$625.00	Receipt and review of Order directing
						Plaintiffs to file a response to Ford's
						Motion to Extend Time; communicate with
						co-counsel regarding same
6/23/2017	Sandra D. Burch	\$135.00	4.00	2.00	\$270.00	Search transcripts and pleadings for
						references to security surrounding Ford's
						protection of its source code

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/23/2017	Niall A. Paul	\$500.00	1.50	0.75	\$375.00	Review and consider Plaintiffs' Motion for Interpretation of Protective Order
6/26/2017	Niall A. Paul	\$500.00	3.20	1.60	\$800.00	Review and revise Plaintiffs' Memorandum in Opposition to Defendant's Motion to Extend Time to Answer Plaintiffs' Motion for Sanctions; communicate with co-counsel regarding same
6/26/2017	Nathan B. Atkinson	\$400.00	3.00	1.50	\$600.00	Revise Brief in Opposition to Motion for Extension of Time; consider issues regarding need to supplement
6/28/2017	Niall A. Paul	\$500.00	7.00	3.50	\$1,750.00	continuing working on our approach to supporting our motion for sanctions and Ford's Motion for a Continuance
6/29/2017	Niall A. Paul	\$500.00	7.40	3.70	\$1,850.00	Further consideration of a possible motion to Clarify the protective order; telephone Conference with Adam Levitt and John Tangren Regarding the same; consider Ford's reply with regard to their motion for 120 day continuance to respond to our motion for sanctions

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
6/30/2017	Niall A. Paul	\$500.00	8.90	4.45	\$2,225.00	Addressing Ford's strategic approach in
						responding to motion for sanctions including
						reviewing and considering Ford's attempt to
						clawback source code produced during
						discovery
7/1/2017	Nathan B. Atkinson	\$400.00	2.00	1.00	\$400.00	Assess separate issue related to Ford attempt
						to claw back source code
7/3/2017	Sandra D. Burch	\$135.00	3.00	1.50	\$202.50	e-mail communications concerning Ford's
						attempt to claw back documents relied upon by
						Philip Koopman
7/5/2017	Sandra D. Burch	\$135.00	1.00	0.50	\$67.50	analyze source code documents Ford proposes
						to claw back
7/6/2017	Niall A. Paul	\$500.00	2.20	1.10	\$550.00	consideration of Ford's request to claw back
						documents
7/10/2017	Sandra D. Burch	\$135.00	0.50	0.25	\$33.75	Review confidentiality order in light of
						Ford's attempt to claw back certain computer
						code
7/19/2017	Niall A. Paul	\$500.00	3.50	1.75	\$875.00	review briefing on Ford's discovery conduct
						and motion for sanctions regarding same

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
7/25/2017	Nathan B. Atkinson	\$400.00	6.00	3.00	\$1,200.00	Work on issues related to Motion for Sanctions
7/31/2017	Sandra D. Burch	\$135.00	8.50	4.25	\$573.75	Search hearing transcripts and orders for
						references to source code as requested by Mr.
						Paul
8/16/2017	Nathan B. Atkinson	\$400.00	1.80	0.90	\$360.00	work on issues related to Motion
						for Sanctions
9/2/2017	Nathan B. Atkinson	\$400.00	2.20	1.10	\$440.00	Review Ford's Response to Motion for
						Sanctions
9/5/2017	Niall A. Paul	\$500.00	3.50	1.75	\$875.00	Receipt and review of Ford's Response to
						Plaintiffs' Motion for Relief Related to
						Ford's Discovery Misconduct; communicate with
						co-counsel regarding the same
9/8/2017	Sandra D. Burch	\$135.00	3.80	1.90	\$256.50	assist with reply to Ford's
						response to our sanctions motion regarding
						source code
9/8/2017	Nathan B. Atkinson	\$400.00	3.20	1.60	\$640.00	Work on issues related to Sanctions Motion
						and Ford's communication of source code
						outside of FMC
9/22/2017	Niall A. Paul	\$500.00	4.00	2.00	\$1,000.00	continued review of Ford's



**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						Sanctions Motion Response and consideration
						of our reply
9/25/2017	Niall A. Paul	\$500.00	3.00	1.50	\$750.00	continued review of Ford's
						Sanctions Motion Response and consideration
						of our reply
10/9/2017	Nathan B. Atkinson	\$400.00	2.00	1.00	\$400.00	Work on issues related to Reply to Sanctions
						Motion
10/9/2017	Pamela J. Haynes	\$115.00	2.75	1.38	\$158.13	Read Plaintiffs' motion for relief related to
						Ford's discovery misconduct and related court
						filings, including Ford's responses thereto.
						Research court hearing transcripts and review
						pertinent source code documents to find
						arguments to include in Plaintiffs' rebuttal
						reply to Ford's response
10/9/2017	Niall A. Paul	\$500.00	2.80	1.40	\$700.00	Work on issues relating to upcoming reply
						regarding our motion for sanctions
10/10/2017	Sandra D. Burch	\$135.00	2.50	1.25	\$168.75	research transcripts
						for support for reply to Ford's response to
						our motion for sanctions for discovery
						misconduct involving source code

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
10/10/2017	Pamela J. Haynes	\$115.00	7.50	3.75	\$431.25	Research court hearing transcripts and review
						pertinent source code documents to find
						arguments to include in Plaintiffs' rebuttal reply to
						Ford's response
10/11/2017	Pamela J. Haynes	\$115.00	5.00	2.50	\$287.50	Continue work on researching hearing
						transcripts and other documents to identify
						statements made relating to producing source
						code for use in rebuttal reply to discovery
						misconduct motion
10/12/2017	Pamela J. Haynes	\$115.00	1.50	0.75	\$86.25	Continue researching documents regarding
						source code for consideration toward rebuttal
						reply related to plaintiffs' motion for
						sanctions
10/13/2017	Niall A. Paul	\$500.00	3.80	1.90	\$950.00	Continue to work on issues relating to
						upcoming reply regarding our motion for
						sanctions
10/13/2017	Sandra D. Burch	\$135.00	7.00	3.50	\$472.50	Assist with reply to Ford's response to our
						motion for sanctions with respect to
						discovery misconduct
10/13/2017	Nathan B. Atkinson	\$400.00	3.50	1.75	\$700.00	Work on issues
						related to Motion for Sanctions and Reply;

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						Communicate with co-counsel re same; Review draft and comment
10/13/2017	Pamela J. Haynes	\$115.00	4.50	2.25	\$258.75	Continue research for source code, secure room, and supplier discussions in hearing transcripts, protective order motions, and discovery documents for rebuttal reply related to discovery misconduct motion. Email results to Niall Paul and Sandy Burch.
						Telephone conference with Sandy Burch regarding feedback. Revised research results
10/16/2017	Niall A. Paul	\$500.00	1.00	0.50	\$250.00	Prepare for and attend telephone conference with Judge Eifert addressing Ford's expert disclosure, as well as, Fords attempt to clawback source code
10/16/2017	Sandra D. Burch	\$135.00	2.50	1.25	\$168.75	Continued assistance with transcript searches related to reply brief
10/16/2017	Pamela J. Haynes	\$115.00	4.50	2.25	\$258.75	Continue work on compiling information from court orders and hearing transcripts for rebuttal reply relating to plaintiffs' motion for discovery misconduct. Email exchanges and telephone conferences to obtain directions from Sandy Burch. Email updated draft to

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						Sandy Burch for review before submitting to
						Niall Paul
10/17/2017	Pamela J. Haynes	\$115.00	2.30	1.15	\$132.25	Continue researching orders and transcripts
						for data to incorporate into rebuttal
						relating to plaintiffs' motion for discovery
						conduct. Email results to Sandy Burch for
						review
10/17/2017	Sandra D. Burch	\$135.00	2.70	1.35	\$182.25	work on reply brief
						regarding discovery misconduct
11/14/2017	Niall A. Paul	\$500.00	5.00	2.50	\$1,250.00	Work on issues relating to motion for
						sanctions including attending hearing with
						Judge Chambers regarding the appointment of
						Dr Sanders
11/16/2017	Nathan B. Atkinson	\$400.00	4.20	2.10	\$840.00	Review Order re Surreply and permitting
						Response to Surreply on Motion for Sanctions;
						Conference re strategy for same
11/22/2017	Sandra D. Burch	\$135.00	0.40	0.20	\$27.00	Search file for information requested by Mr.
						Paul regarding source code in connection with
						Surreply
11/27/2017	Niall A. Paul	\$500.00	1.80	0.90	\$450.00	Review and finalize Plaintiffs Motion and

**SPILMAN THOMAS & BATTLE, PLLC TIME**

<b>Date</b>	<b>Attorney</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Adjusted Hours</b>	<b>Amount</b>	<b>Description</b>
						Memorandum in Support of Their Motion for
						Leave to File Their Response to Ford Motor
						Company's Surreply to Plaintiffs' Reply in
						Support of Their Motion for Relief Under Seal
						and For Leave to File Publicly-Available
						Redacted Versions Where Possible
<b>Totals</b>				<b>255.88</b>	<b>\$100,759.88</b>	

# Exhibit O

**SPILMAN THOMAS & BATTLE, PLLC EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Adjusted Amount</b>	<b>Description</b>
4/13/2015	\$45.98	\$45.98	Century Link Telephone Conference Call
5/15/2015	\$800.05	\$800.05	Airfare, Niall A. Paul, Meeting with Barr Group
5/15/2015	\$48.15	\$48.15	Meal expense, Meeting with Barr Group
5/15/2015	\$3.00	\$3.00	Parking, Meeting with Barr Group
5/15/2015	\$178.08	\$178.08	Taxi, Niall A. Paul, Meeting with Barr Group
5/27/2015	\$84.82	\$84.82	Secretarial overtime - meeting in Charleston, expert in Charleston
5/28/2015	\$60.95	\$60.95	Mileage, Niall A. Paul, Hearing before Judge Eifert
5/28/2015	\$111.72	\$111.72	Meal expense, Niall A. Paul, Hearing before Judge Eifert
5/28/2015	\$121.17	\$121.17	Secretarial overtime - preparation for hearing
9/16/2015	\$105.58	\$105.58	Transcript of telephone conference with Judge Eifert
9/21/2015	\$290.98	\$290.98	Transcript of telephone conference with Judge Eifert
6/7-8/2017	\$255.84	\$127.92	Lodging, Nathan B. Atkinson, meeting with Phil Koopman
6/7-8/2017	\$347.75	\$173.88	Meal expenses, meeting with Phil Koopman
6/7-8/2017	\$25.68	\$12.84	Mileage, Nathan B. Atkinson, meeting with Phil Koopman
6/7-8/2017	\$20.00	\$10.00	Parking, Nathan B. Atkinson, meeting with Phil Koopman
6/7-8/2017	\$115.00	\$57.50	Taxi, Nathan B. Atkinson, meeting with Phil Koopman
6/7-8/2017	\$242.89	\$121.45	Mileage, Niall A. Paul, meeting with Phil Koopman
6/7-8/2017	\$13.00	\$6.50	Parking/tolls, Niall A. Paul, meeting with Phil Koopman

**SPILMAN THOMAS & BATTLE, PLLC EXPENSES**

<b>Date</b>	<b>Amount</b>	<b>Adjusted Amount</b>	<b>Description</b>
6/7-8/2017	\$78.43	\$39.22	Meal expenses, Niall A. Paul, meeting with Phil Koopman
6/16-19/2017	\$644.92	\$322.46	Secretarial overtime - Filing of Sanctions Motion
11/27/2017	\$28.66	\$14.33	Secretarial overtime - Filing of Motion to Seal
<b>Total Expenses</b>		<b>\$2,736.57</b>	